



UNITED STATES DEPARTMENT OF COMMERCE
National Telecommunications and Information Administration
Washington, D.C. 20230
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. Dale Hatfield, Chief
Office of Engineering and Technology
Federal Communications Commission
2000 M Street, N.W.
Washington, DC 20554

Re: Allocation and Designation of Spectrum for Fixed-Satellite Services in the 37.5-38.5 GHz, 40.5-41.5 GHz, and 48.2-50.2 GHz Frequency Bands; Allocation of Spectrum to Upgrade Fixed and Mobile Allocations in the 40.5-42.5 GHz Frequency Band, Allocation of Spectrum in the 46.9-47.0 GHz Frequency Band for Wireless Services; and Allocation of Spectrum in the 37.0-38.0 GHz and 40.0-40.5 GHz for Government Operations.
IB Docket No. 97-95

Dear Mr. Hatfield:

The National Telecommunications and Information Administration submits this letter as part of our on-going response to the above-referenced proceeding. We have commented earlier regarding the importance of the 37-38 GHz band¹, and are aware of potential difficulties in sharing the 37.5-38.0 GHz band between the fixed-satellite service proposed to operate in the 37.5-38.5 GHz band, and the space research service. The National Aeronautics and Space Administration (NASA) will use the 37-38 GHz band for future manned exploration of the solar system and to provide wideband data return links from the Very Long Baseline Interferometer (VLBI). The VLBI data requires highly accurate time and phase reference signals from Earth-to-space and from space-to-Earth links.

As the Commission proceeds with the referenced rulemaking, we request that the currently proposed fixed-satellite allocation of 37.5-38.5 GHz be adjusted to 37.6-38.6 GHz. This would reduce the overlap between the proposed fixed-satellite and the space research allocations by 100 MHz, and thereby reduce the potential for interference to NASA's future space research operations.

Further, analysis conducted by NASA's Jet Propulsion Laboratory has indicated that sharing space research (deep space) with the fixed-satellite service using non-geostationary orbit (non-GSO)

¹ Letter from Richard Parlow, NTIA, to Mr. Richard Smith, Chief, OET, April 30, 1997.

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satellites will present extreme difficulties in protecting the earth stations. If the proposed fixed-satellite allocation were limited to GSO systems, the sharing would be less problematic. Therefore, NTIA requests that the fixed-satellite allocation in the 37.6-38.6 GHz band be limited to GSO satellite systems.

I appreciate your consideration of these requests, and look forward to the completed rulemaking on this very important part of the spectrum.

Sincerely,

A handwritten signature in black ink, appearing to read "William T. Hatch", with a stylized, cursive script.

William T. Hatch
Acting Associate Administrator
for Spectrum Management

cc: Ms. Regina M. Keeney
Chief, International Bureau, FCC